

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PATSY D. BAIN,

Plaintiff,

v.

LABORATORY CORPORATION OF AMERICA,

Defendant.

C.A. No. 23-310-CFC

**STIPULATION AND [PROPOSED] ORDER REGARDING
NOTICE OF SETTLEMENT AND REQUEST TO STAY**

Plaintiff, Patsy D. Bain, and Defendant, Laboratory Corporation of America (collectively, the “Parties”), by and through their respective undersigned attorneys, respectfully submit this Stipulation and [Proposed] Order Regarding Notice of Settlement and Request to Stay, and state as follows:

1. The Parties have executed a settlement agreement regarding all claims between them in the above-referenced matter and require additional time to effectuate the terms of the agreement.

2. The Parties anticipate that they will file a Stipulation of Dismissal with Prejudice within sixty (60) days, depending on when the consideration associated with the settlement agreement is tendered.

3. The Parties, therefore, jointly respectfully request that all deadlines in this matter be stayed pending the filing of the Stipulation of Dismissal with

Prejudice.

4. The Parties will submit a joint status report to the Court forty-five (45) days from the date of this stipulation.

WHEREFORE, the Parties respectfully request a 60-day stay of all deadlines and agree to submit a Joint Status report to the Court forty-five days from the date of this stipulation.

THE POLIQUIN FIRM LLC

/s/ Ronald Poliquin
Ronald G. Poliquin (No. 4447)
1475 S. Governors Ave.
Dover, DE 19904
Phone: (302) 702-5501

Attorneys for Plaintiff
Patsy D. Bain

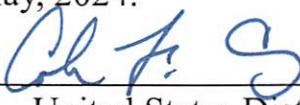
K&L GATES LLP

/s/ Megan O'Connor
Steven L. Caponi (No. 3484)
Megan E. O'Connor (No. 6569)
600 N. King Street, Suite 901
Wilmington, DE 19801
Phone: (302) 416-7000
steven.caponi@klgates.com
megan.oconnor@klgates.com
-and-

J. Walker Coleman, IV
Cecilia Rose Ehresman
134 Meeting Street, Suite 500
Charleston, SC 29401
walker.coleman@klgates.com
cecilia.ehresman@klgates.com

Attorneys for Defendant
Laboratory Corporation of America

SO ORDERED this 20th day of May, 2024.


United States District Judge